## Federal Defenders OF NEW YORK, INC.

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Tamara Giwa

Executive Director

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July 11, 2025

By ECF

Honorable Sarah L. Cave United States Courthouse 500 Pearl Street New York, NY 10007 Application GRANTED. Mr. Elting may travel on the conditions and in the manner set forth below.

SO ORDERED.

USMJ 7/17/2025

Re: <u>United States v Lawrence Elting</u>, 24 Cr. 389 (SLC)

Dear Judge Cave:

I write on behalf of my client, Lawrence Elting, to request a modification of his conditions of probation to permit the following:

- 1. All domestic travel (not limited to employment purposes) outside of the federal district where Mr. Elting is authorized to reside (Southern District of Florida) without first seeking permission from Probation. Previously, on January 7, 2025, the Court modified Mr. Elting's conditions of Probation to permit him to travel domestically as requested by his employer without first seeking permission from Probation but requiring him to provide his Probation Officer in advance with itineraries for such travel and contact information while traveling. ECF No. 76.
- 2. International travel as requested by Mr. Elting's employment without first seeking permission from the Court or Probation but requiring Mr. Elting to provide his Probation Officer with itineraries for such travel and contact information while traveling.

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Mr. Elting's Probation Officer in the Southern District of Florida has no objection to these modifications. And, in light of Probation's position, the Government consents to the requested modifications without prejudice to a future request to reimpose travel restriction.

Restrictions on Mr. Elting's ability to travel domestically serve no purpose of sentencing. Including the time on Pretrial release, Mr. Elting has now been under community supervision for nearly three years and has never once violated the terms of his release. While on Pretrial release, Mr. Elting's bail conditions were modified to allow him to travel for any purpose without restriction or prior permission, within the continental United States. Mr. Elting never abused this authorization, which was in effect for 20 months prior to sentencing and he steadfastly complied with this and all of his conditions of release. He is again seeking that same modification while on Probation. Mr. Elting is raising two college-age children who attend school outside of his district of residence. His son is an accomplished basketball player who frequently travels for college ballgames and recruitment purposes. The modification requested will allow Mr. Elting the unfettered ability to accompany his children to school, to visit them and to attend academic and athletic events.

An international travel restriction likewise serves no sentencing purpose. In fact, it is limiting Mr. Elting's employment opportunities and earning potential. Mr. Elting is the Executive Director of Global Client Deliver at his company. Because of the travel restriction, he has had to decline several promotions and employment opportunities offered by his employer that would require him to travel overseas. The inability to travel internationally to meet with global clients is not sustainable and is likely to have an adverse impact on ongoing client relationships.

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Mr. Elting has demonstrated that he presents no risk to the community or any risk of flight. He is responsible and reliable. Therefore, in light of the foregoing and given the consent of Probation and the Government, I respectfully request that the Court modify Mr. Elting's conditions of probation as requested.

Respectfully submitted,

/s/ Amy Gallicchio

Amy Gallicchio, Esq. Assistant Federal Defender Federal Defenders of New York

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Cc: AUSA Michael Maimin USPO Shaina Kus, Southern District of Florida